

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
Docket No. 9:22-CV-81780-DMM-WM

DONALD J. TRUMP,

Plaintiff,

v.

LETITIA JAMES, individually,

Defendant.

**PLAINTIFF'S UNOPPOSED MOTION TO CONFORM AMENDED
COMPLAINT TO LOCAL RULES AND SUBSTITUTE EXHIBIT**

Plaintiff, President DONALD J. TRUMP ("Plaintiff"), by and through his undersigned counsel and pursuant to Southern District of Florida Local Rule 5.1(b) and 7.1(a)(1)(I) files this Unopposed Motion to Conform Amended Complaint to Local Rules and Substitute Exhibit, and would show:

1. Southern District of Florida Local Rule 5.1(b) requires all documents to be served in a case to be filed in compliance with the Southern District's CM/ECF NextGen Administrative Procedures (the "Local CM/ECF Procedures").

2. Local CM/ECF Procedures Rule 3G(5) requires filings to be text searchable.

3. All or part of Composite Exhibit A to Defendant's Notice of Removal ("NOR") (Doc. 1-1), which contains the state court file, is not text searchable.

4. Although portions of the state court file may be convertible into a searchable format, several pages of Exhibit A to the Amended Complaint seem to have been corrupted when originally filed in state court. Significant sections of the text found in Exhibit A to the Amended Complaint overlap, making the document illegible to the reader and making it unlikely that OCR/text layering software could successfully convert the current version to a text-searchable format.

5. To streamline the Court's review of the current briefs, simplify briefing for both sides moving forward, and make the operative complaint in this action both compliant with the Local Rules and accessible to the vision-impaired, Plaintiff requests leave to file a copy of the operative Amended Complaint (including exhibits) separately with the Court that is text searchable and substitutes existing Exhibit A with a non-corrupted file. The proposed filing will make no changes to the text of the Amended Complaint or to any of the exhibits to the Amended Complaint beyond addressing the overlapping text issue.

WHEREFORE, Plaintiff requests leave of the Court to file copy of the Amended Complaint that is text searchable and conforms with Local Rules and

Local CM/ECF Procedures, and substitutes a non-corrupted version of Exhibit A to the Amended Complaint for the existing Exhibit A.

Local Rule 7.1 (a)(3) Certification

On December 15, 2022, the undersigned conferred with Defendant's counsel pursuant to Local Rule 7.1(a)(3), who stated that Defendant does not object to the relief requested herein.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the Court's CM/ECF system this 20th day of December, 2022, which will electronically serve all registered electronic filing users. See Local Rule 5.1(e).

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